

WYOMING GAME AND FISH DEPARTMENT

Dave Freudenthal, Governor



Terry Cleveland, Director

"Conserving Wildlife - Serving People"

June 6, 2005

WER 11161
Federal Register
Animal and Plant Health Inspection Service
Notice of Availability of a Draft Strategic Plan and
Draft Program Standards

Docket No. 05-015-1
Neil Hammerschmid
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Dear Mr. Hammerschmidt:

The staff of the Wyoming Game and Fish Department has reviewed the Federal Register Notice of availability of a draft strategic plan and draft program standards by the Animal and Plant Health Inspection Service. We offer the following comments.

The Wyoming Game and Fish Department (WGFD) supports the federal government's National Animal Identification System (NAIS). The purported rationale for the NAIS is the containment and eradication of cattle diseases, such as bovine spongiform encephalopathy (BSE). We would urge the federal government to consider cervid (deer, elk) species used in commerce to be subject to the NAIS as well. Chronic wasting disease (CWD) is a spongiform encephalopathy similar to BSE, but restricted to cervids. The federal government is implementing a national CWD eradication plan for farmed cervids and animal identification is part of that plan. We suggest that any animal identification system be standardized across species.

The WGFD feels that the NAIS should be mandatory and that implementation by January 2009 is reasonable. The NAIS is crucial, not only for tracking domestic animal diseases, but it will aid in the tracking of cattle diseases which also may threaten the health of the nation's wildlife (e.g., foot and mouth, anthrax).

The WGFD feels that producers should be responsible for identifying and recording individual animals. Compliance of the NAIS should take place at any premise to which said identified animals are translocated, be it a fair, sale barn, or another ranch. If the owner does not

Mr. Neil Hammerschmid

June 6, 2005

Page 2 – WER 11161

have the facilities to attach the appropriate identification tag, such animals should be appropriately tagged at their point of destination prior to any commingling. Tagging other than the point of origin would still be the financial responsibility of the original owner.

The WGFD feels that electronic (i.e. computer, palm pilot etc) recording of data should be mandatory; that such files could easily be e-mailed daily to the appropriate agency. We feel that electronic recording and reporting is the most efficient, economic, and effective means of data movement. Electronic submission should be mandatory for all parties responsible for reporting animal identifications. The federal government could financially assist those lacking appropriate equipment.

The WGFD opposes privatization of the NAIS. Our comments relate specifically to the commercial cervid industry, which may not come under the current NAIS. We oppose privatization of a national animal identification system for cervids because of the long-standing and well documented disregard of the cervid industry for complying with animal movement regulations. The WGFD feels that the privatization of animal identification would be too easily corrupted and not serve its intended purpose.

The WGFD appreciates this opportunity to comment on this important plan to aid in the identification and tracking of animal diseases.

Thank you for the opportunity to comment.

Sincerely,

BILL WICHERS
DEPUTY DIRECTOR

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cc: Mary Flanderka-Governor's Planning Office
USFWS